



May 30, 2025

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

In re Google Digital Advertising Antitrust Litigation
Case No. 1:21-md-03010 (PKC)

Dear Judge Castel:

I write on behalf of MDL Plaintiffs in the above-referenced matter to seek leave to file under preliminary seal an unredacted version of MDL Plaintiffs' pre-motion letter for leave to move for an adverse inference and unredacted versions of certain exhibits thereto. These exhibits and portions of the letter contain or reference material that Google has designated as Confidential or Highly Confidential and, pursuant to the parties' Modified Confidentiality Order ("Confidentiality Order"), ECF 685 ¶21, that Google has proposed be filed with reasonable redactions after having received seven days' notice from MDL Plaintiffs. MDL Plaintiffs take no position on Google's confidentiality designations at this time. No conference is scheduled.

Exhibits Nos. 1, 4-9, 16, 19, 22, 24, 25, and 27 are documents that Google produced in this litigation, designated as Confidential or Highly Confidential, and to which Google proposed redactions pursuant to the Confidentiality Order. Exhibit No. 13 is an excerpt of the transcript of a deposition of a Google witness, of which Google has designated certain portions Confidential or Highly Confidential, and to which Google proposed redactions pursuant to the Confidentiality Order.

Plaintiffs respectfully submit that good cause exists to file under preliminary seal the unredacted version of MDL Plaintiffs' pre-motion letter for leave to move for an adverse inference and unredacted versions of certain exhibits thereto. Plaintiffs respectfully request that the Court defer ruling on this motion for five business days so that Google may file a motion to seal, if any, pursuant to the Confidentiality Order. Pursuant to this Court's Individual Practices, ¶5.B, MDL Plaintiffs are filing proposed sealed documents electronically through the Court's ECF system. MDL Plaintiffs are also filing redacted versions of the pre-motion letter and certain exhibits publicly on the docket.

Respectfully submitted,

/s/ Philip C. Korologos
Philip C. Korologos
BOIES SCHILLER FLEXNER LLP

Copies to: All Counsel of Record (via ECF)

BOIES SCHILLER FLEXNER LLP